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10 Attorneys for Defendant  
11 LG.PHILIPS LCD AMERICA, INC.

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

Crago Corporation, individually and on behalf  
of all those similarly situated,

Plaintiff,

vs.

LG.Philips LCD Co. Ltd., LG.Philips LCD  
America, Inc.; Samsung Electronics Co. Ltd.;  
Sharp Corporation; Sharp Electronics  
Corporation; Toshiba Corporation; Toshiba  
Matsushita Display Technology Co., Ltd.;  
Hitachi Ltd.; Hitachi Displays, Ltd.; Hitachi  
America Ltd.; Hitachi Electronic Devices  
(USA), Inc.; Sanyo Epson Imaging Devices  
Corporation; NEC Corporation; NEC LCD  
Technologies, Ltd.; NEC Electronics America,  
Inc.; IDT International Ltd.; AU Optronics;  
International Display Technology Co., Ltd.;  
International Display Technology USA Inc.;  
AU Optronics Corporation America; Chi Mei  
Optoelectronics; Chi Mei Optoelectronics  
USA, Inc.; Chunghwa Picture Tubes Ltd.;  
Hannstar Display Corporation;

Defendants.

CASE NO. C 06-07644 (MMC )

**SECOND AMENDED STIPULATION  
AND [PROPOSED] ORDER FOR  
EXTENSION OF TIME TO RESPOND  
TO COMPLAINT**

Honorable Maxine M. Chesney

1           WHEREAS plaintiff filed a complaint in the above-captioned case on or about  
2 December 13, 2006;

3           WHEREAS plaintiff alleges antitrust violations by manufacturers of Liquid  
4 Crystal Display (“LCD”) products;

5           WHEREAS at least forty complaints have been filed to date in federal district  
6 courts throughout the United States by plaintiffs purporting to bring class actions on behalf of  
7 direct and indirect purchasers alleging antitrust violations by manufacturers of LCD products  
8 (collectively, “the LCD Cases”);

9           WHEREAS there are motions pending before the Judicial Panel on Multidistrict  
10 Litigation (“JPML”) to transfer the LCD cases to the Northern District of California and the  
11 District of New Jersey for consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407;

12           WHEREAS plaintiff anticipates the possibility of Consolidated Amended  
13 Complaints in the direct and indirect LCD cases;

14           WHEREAS plaintiff and LG Philips LCD America, Inc. (“LPL America”) have  
15 agreed that an orderly schedule for any response to the pleadings in this case would be more  
16 efficient for the parties and for the Court;

17           WHEREAS plaintiff agrees that the deadline for LPL America to respond to the  
18 Complaints in the above-captioned case shall be extended until the earlier of the following two  
19 dates: (1) forty-five days after the filing of Consolidated Amended Complaint(s) in the  
20 transferee court in which the LCD Cases are consolidated by the JPML; or (2) forty-five days  
21 after plaintiffs provide written notice to LPL America that they do not intend to file a  
22 Consolidated Amended Complaint, provided that such notice may be given only after the initial  
23 case management conference in the MDL transferee court in this case;

24           WHEREAS plaintiff further agrees that this extension is available, without further  
25 stipulation with counsel for plaintiff to all named defendants who notify plaintiff in writing of  
26 their intention to join this extension;

27           WHEREAS this Stipulation does not constitute a waiver by LPL America or any  
28 other defendant of any defense, including but not limited to the defenses of lack of personal or

1 subject matter jurisdiction, insufficiency of process, insufficiency of service of process, or  
2 improper venue.

3               WHEREAS LPL America (and any other named defendant who provides notice of  
4 its intention to join this extension provided by this Stipulation) agrees that, notwithstanding the  
5 other terms of this Stipulation, should it respond to any complaint in another LCD case filed in  
6 another United States District Court prior to the date contemplated by this Stipulation (except  
7 pursuant to Court Order), then it shall make a simultaneous response to the complaint in the  
8 above-captioned matter.

9               PLAINTIFF AND DEFENDANT LPL AMERICA, BY AND THROUGH THEIR  
10 RESPECTIVE COUNSEL OF RECORD, HEREBY STIPULATE AND AGREE AS  
11 FOLLOWS:

12               1.         The deadline for LPL America to respond to any Complaint in the above-  
13 captioned case shall be extended until the earlier of the following two dates: (1) forty-five days  
14 after the filing of Consolidated Amended Complaint(s) in the transferee court in which the LCD  
15 Cases are consolidated by the JPML; or (2) forty-five days after plaintiffs provide written notice  
16 to LPL America that they do not intend to file a Consolidated Amended Complaint, provided that  
17 such notice may be given only after the initial case management conference in the MDL  
18 transferee court in this case.

19               2.         This extension is available, without further stipulation with counsel for  
20 plaintiff or further order of the Court, to all named defendants who notify plaintiff in writing of  
21 their intention to join this extension.

22               3.         This Stipulation does not constitute a waiver by LPL America or any  
23 defendant of any other defense, including but not limited to the defenses of lack of personal or  
24 subject matter jurisdiction, insufficiency of process, insufficiency of service of process, or  
25 improper venue.

26               4.         Notwithstanding the other terms of this Stipulation, should LPL America  
27 (and other named defendant who provides notice of its intention to join this extension provided by  
28 this Stipulation) respond to any complaint in another LCD case filed in another United States

1 District Court prior to the date contemplated by this Stipulation (except pursuant to Court Order),  
2 then it shall make a simultaneous response to the complaint in the above-captioned matter.

3 IT IS SO STIPULATED.  
4

5 DATED: February 6, 2007

Respectfully submitted,

6 MUNGER, TOLLES & OLSON LLP

7 By: \_\_\_\_\_ /s/ Jerome C. Roth  
8 JEROME C. ROTH  
9 Attorneys for Defendant  
LG.PHILIPS LCD AMERICA, INC

10 Of Counsel:

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12 Jeremy J. Calsyn  
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14 Telephone: (202) 974-1500  
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15

16 DATED: February 6, 2007

SAVERI & SAVERI, INC.

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18 By: \_\_\_\_\_ /s/ R. Alexander Saveri  
19 GUIDO SAVERI  
R. ALEXANDER SAVERI  
20 CADIO ZIRPOLI  
Attorneys for Plaintiff  
21 CRAGO CORPORATION  
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24 PURSUANT TO STIPULATION, IT IS SO  
ORDERED:

25 Dated: February 7, 2007

  
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Honorable Maxine M. Cheneay

Judge of the United States District Court